

Message

From: Gross, Louise C [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=25A8DF2A549B43FCAFB543F4388B170A-LGROSS02]
Sent: 4/27/2020 4:02:11 PM
To: Harrington, Arthur [ajharrin@gklaw.com]; Bonar-Bridges, James I - DNR [james.bonarbridges@wisconsin.gov]
BCC: Schaufelberger, Daniel [schaufelberger.daniel@epa.gov]
Subject: RE: NEW Water Stack Test. [GK-Active.FID2939509]

Art,

I received your voice mail on this matter, as well. I will be following up with James and Dan Schaufelberger.

Also, did you receive a 4/13/20 email from me requesting some additional information on the GAC? It isn't showing up in my "Send" folder, but Dan has a copy.

Thanks.

Louise

Louise C. Gross
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From: Harrington, Arthur <ajharrin@gklaw.com>
Sent: Friday, April 24, 2020 4:29 PM
To: Gross, Louise C <gross.louise@epa.gov>; Bonar-Bridges, James I - DNR <james.bonarbridges@wisconsin.gov>
Subject: NEW Water Stack Test. [GK-Active.FID2939509]

Dear Louise and James:

As you know, our client, NEW Water, has conducted a compliance stack test on March 19-20, 2020 following resumption of incineration operations after the repair of the Granulated Activated Carbon Absorption system (GAC). NEW Water requested engineering tests to be run immediately before entry into the GAC (Inlet) in addition to the compliance testing that was conducted at the GAC outlet (in the stack) for mercury and particulate matter, to better understand removal efficiency of the GAC for those two pollutants.

NEW Water has recently received the preliminary results of the stack test. The preliminary results- show compliance with the Hg limit for the Subpart LLLL standard at the Outlet. In fact, the measured Hg concentration is less than the test method's detection level.

However, to the surprise of NEW Water, the Outlet results suggest noncompliance with the particulate standard under Subpart LLLL. The average Outlet PM emission rate, 30.5 mg/dscm @ 7% oxygen, exceeds the standard of 9.6 mg/dscm @ 7% oxygen. Compounding the unexpected results, is that the measured PM rate into the GAC, 2.61 mg/dscm, was lower than the Outlet rate and in compliance with the standard. NEW Water and the stack testing firm, as well as consultants and the designer of the GAC system, are in the process of evaluating whether these values are accurate (Evaluation). NEW Water is also contemplating conducting another stack test in the near future once this Evaluation is completed to assure continuing compliance with the Subpart LLLL standards.

Please be advised that NEW Water will follow up this e-mail with a more formal notification regarding the stack test results once

the Evaluation is completed.

Please feel free to contact me if you have any questions about the topic of this e-mail.

Best regards,

Art

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